

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Joseph M. Rutkoski, Sr.

CHAPTER 13

CASE NO. 5 - 16 -bk- 04378-jjt

Debtor(s)

Vandebilt Mortgage and Finance, Inc.

ADVERSARY NO. - ap-
(if applicable)

Plaintiff(s)/Movant(s)

vs.

Joseph M. Rutkoski, Sr.

Charles J. DeHart, III

Nature of Proceeding: Motion for Relief

Motion for Relief

Defendant(s)/Respondent(s)

Document #: 56

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

The parties are in the process of negotiating a settlement of the Motion for Relief and request a continuance to allow additional time to finalize a stipulation.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 3/9/18

/s/Sarah K. McCaffery

Attorney for Movant

Name: Sarah K. McCaffery

Phone Number: 215-886-8790

¹ No alterations or interlineations of this document are permitted.